

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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CASE NO. 09-03939(ESL)

JUANA M ORTIZ PABON

CHAPTER 13

Debtor(s)

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REPLY TO TRUSTEE'S UNFAVORABLE REPORT ON CONFIRMATION

TO THE HONORABLE COURT:

NOW COMES the above named debtors through the undersigned attorney and very respectfully prays and alleges:

1. That the chapter 13 Trustee filed an Unfavorable Report on Confirmation of Plan dated July 8, 2009 inasmuch as the same is insufficiently funded to pay the general unsecured creditors 100 + 6%.

2. That debtor filed amended plan dated December 2, 2009 with a base of \$25,200.00 which is sufficiently funded to pay 100 + 6% to the general unsecured creditor.

3. That debtor is current with the plan.

WHEREFORE it is respectfully requested that this Honorable Court take notice of the aforesated, and confirm the amended plan dated December 2, 2009 on its day.

I CERTIFY that on this date I sent by electronic mail a true copy of this motion to trustee Alejandro Oliveras, Esq., and by regular U.S. to parties in interest and to creditors as per master address list.

In San Juan, Puerto Rico, this December 2, 2009.

/s/EMILY D DAVILA
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